

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA
EASTERN DIVISION

Civil No. 3:23- cv-00019

CHARLEE LANG; GREGORY LANG on)
behalf of minor daughter J.L.,)
)
Plaintiffs,)
)
vs.)
)
OAK GROVE LUTHERAN SCHOOL,)
through its Board of Regents; DANIEL STOA,)
in his official and individual capacity;)
MICHAEL SLETTE, in his official and)
individual capacity; BRENT WOLF, in his)
official and individual capacity; AMIEE)
ZACHIRSON, in her official and individual)
capacity,)
)
Defendants.)

**MEMORANDUM OF LAW IN
SUPPORT OF DEFENDANTS OAK
GROVE LUTHERAN SCHOOL,
MICHAEL SLETTE, BRENT WOLF
AND AIMEE ZACHRISON’S MOTION
FOR TIME EXTENSION ON
RESPONSE TO PLAINTIFFS’
AMENDED COMPLAINT AND
REQUEST FOR EXPEDITED
DECISION**

[¶ 1] Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and other applicable law, Defendants Oak Grove Lutheran School, Michael Slette, Brent Wolf, and Aimee Zachrison (collectively “Oak Grove Defendants”), request the Court extend their current May 31, 2023 deadline to respond to Plaintiffs’ Amended Complaint (doc. 28) to June 14, 2023.

[¶ 2] Good cause exists for the requested extension of time. Oak Grove Defendants intend to file a Rule 12(b)(6) motion requesting dismissal of the Amended Complaint for failure to state a claim. The attorney principally responsible for briefing in this case, Shawn Grinolds, would have considerable difficulty completing the Rule 12 brief in a timely manner without the requested extension due to other work commitments, including a trust petition, deposition preparation session and deposition.

[¶ 3] Plaintiffs’ counsel has informed the undersigned that Plaintiffs do not object to

this requested time extension.

[¶ 4] As the current deadline for the Oak Grove Defendants' to respond to Plaintiffs' Amended Complaint is May 31, 2023, **Oak Grove Defendants request an expedited decision on this motion.**

[¶ 5] For the foregoing reasons, Oak Grove Defendants request the Court to extend the deadline for their response to Plaintiff's Amended Complaint to June 14, 2023.

Dated the 26th day of May, 2023.

BAKKE GRINOLDS WIEDERHOLT

By: /s/ Shawn A. Grinolds
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Attorney for Oak Grove Lutheran School,
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Zachrison

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS OAK GROVE LUTHERAN SCHOOL, MICHAEL SLETTE, BRENT WOLF AND AIMEE ZACHRISON'S MOTION FOR TIME EXTENSION ON RESPONSE TO PLAINTIFFS' AMENDED COMPLAINT AND REQUEST FOR EXPEDITED DECISION** was on the 26th day of May, 2023, was filed electronically with the Clerk of Court through ECF.

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By: /s/ Shawn A. Grinolds
SHAWN A. GRINOLDS